

EXHIBIT 15

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

COMMONWEALTH OF
MASSACHUSETTS, et al.,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH,
et al.,

Defendants.

Case No. _____

Declaration of Dr. Tony Allen

I, Dr. Tony Allen, hereby declare:

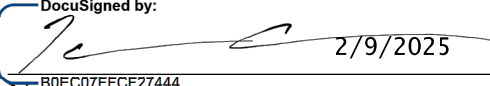
1. I am the President of Delaware State University, a position I have held since January 2022.
As President, I have oversight of Delaware State University. Prior to holding this position, I served as the University's President.
2. As the President, I have knowledge of the matters based on my review of information based upon the records gathered by my staff.
3. I am providing this declaration to explain certain impacts of National Institutes of Health ("NIH") Notice Number NOT-OD-25-068, *Supplemental Guidance to the 2024 NIH Grants Policy Statement: Indirect Cost Rates*, which purports to immediately reduce indirect costs payments to 15%.
4. Delaware State University is Delaware's emerging research university, with a strong and growing portfolio of biomedical research that includes: investigations into the cellular mechanisms of neurodegenerative diseases such as Alzheimer's and Parkinson's disease; development of new AI tools for analysis of medical imaging to allow faster, more accurate

diagnosis of diseases of aging; investigations of the biological basis for disparities in triple negative breast cancer, and the development of a personalized immunotherapeutic approach to treat it; and many more. This research is currently supported by over \$9.3 million in active awards from the NIH.

5. Delaware State University (DSU) has a Negotiated Indirect Cost Rate Agreement (“NICRA”) with NIH, effective as of 9/11/2024. The Indirect Cost (“IDC”) Rate in DSU’s NICRA is 46% for on-campus work and 26% for work off campus.
6. NIH’s reduction of DSU’S IDC rate will eliminate approximately \$1.4 million year in NIH funding that DSU uses to support its biomedical research programs. The loss of these funds will immediately impact DSU’s ability to draw critical funds used to pay expenses associated with research, including salaries of research support personnel, stipends for doctoral students, maintenance of facilities, and other infrastructure supporting research.
7. In particular, the loss of these funds will necessitate laying-off three or more research support personnel, and reductions in or elimination of stipends for institutionally-supported doctoral students in DSU’s Neuroscience PhD program, the only such program offered at an Historically- Black university.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 9th day of February, 2025, in Dover, DE 19901

DocuSigned by:

2/9/2025
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Name
Tony Allen, PhD.
Delaware State University